

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KENNETH KINNAMAN, individually and on behalf of all others similarly situated Plaintiffs, v. PORTFOLIO RECOVERY ASSOCIATES, LLC Defendant.	CIVIL ACTION NO. (REMOVAL OF ACTION)
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**NOTICE OF REMOVAL OF
CIVIL ACTION FROM STATE COURT**

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND.**

Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC (hereinafter referred to as PRA”), by and through its undersigned attorney, respectfully represents as follows:

1. The removing party is the Defendant in the above entitled action. PRA is a Delaware Corporation whose principal place of business is Norfolk, Virginia.
2. On or about February 21, 2012, the above entitled action was commenced, by the filing of a Civil Class Action against PRA in the Circuit Court for Frederick County, Maryland, Case No. 10-C-12-000521 (the “State Court Class Action”), and is now pending therein. *A true and correct copy of the Civil Complaint is attached and marked as **Exhibit A**.*
3. The State Court Class Action alleges that Plaintiff is a Maryland resident. (See **Exhibit A**).
4. The State Court Class Action seeks, *inter alia*, the following relief: monetary damages for violation of the Maryland Rule 2-231 (a), (b)(2) and (3), Maryland's Interception Law. (See *Exhibit A*). The relief sought in the complaint is approximately \$4,000,000.00

5. This Court has original jurisdiction over the above entitled action pursuant to 28 U.S.C. §1332, where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states. Thus, this action must therefore be removed to this Court pursuant to 28 U.S.C. §1441(b). Furthermore, this Court will have pendent jurisdiction over any other state claims that may be asserted by the Plaintiff.

6. In addition, removal is permitted in this case pursuant to 28 U.S.C. §1453(b).

7. This notice is timely filed with the Court within thirty (30) days after service of the State Court Class Action upon the removing party in the above entitled action pursuant to 28 U.S.C. §1446(b).

WHEREFORE, PRA respectfully requests that the above entitled civil action be removed from the Circuit Court for Frederick County, Maryland, Case No. 10-C-12-000521 to this Honorable Court.

Respectfully submitted,

/s/Jeffrey Friedman
Jeffrey Friedman
100 Owings Court, Suite 4
Reisterstown, Maryland 21136
(410) 526-4500
Jeff@friedmanlaw.net
Bar No. 06290

Attorney for Defendant, PORTFOLIO
RECOVERY ASSOCIATES, LLC

Date: March 28, 2012

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KENNETH KINNAMAN, individually and on behalf of all others similarly situated Plaintiff, v. PORTFOLIO RECOVERY ASSOCIATES, LLC Defendant.	CIVIL ACTION NO. (REMOVAL OF ACTION)
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CERTIFICATION OF SERVICE

I, Jeffrey Friedman, hereby certify that on March 28, 2012, a true and correct copy of the attached NOTICE OF REMOVAL OF CIVIL ACTION FROM STATE COURT, was served upon the persons and in the manner set forth below:

FIRST CLASS MAIL, POSTAGE PREPAID, AS WELL AS ELECTRONICALLY IF APPLICABLE, to:

KENNETH KINNAMAN
C/O SCOTT BORISON, ESQ.
LEGG LAW FIRM, LLC
5500 BUCKEYSTOWN PIKE
FREDERICK, MD 21703

Respectfully submitted,

/s/ Jeffrey Friedman
Jeffrey Friedman
100 Owings Court, Suite 4
Reisterstown, Maryland 21136
(410) 526-4500
Jeff@friedmanlaw.net
Bar No. 06290
Attorneys for Defendant PORTFOLIO
RECOVERY ASSOCIATES, LLC

Date: March 28, 2012